

SANTAMARIA AFFIDAVIT
EXHIBIT R
PLAINTIFF'S DEPOSITION
P 93

1

JANKOUSKY

93

2

A I did feel that a verbal would take

3

care of it.

4

Q In connection with this incident,

5

did you review the terms of the incentive

6

program?

7

A Yes.

8

Q Did the incentive program, by its

9

terms, provide for removal from the program

10

for this type of activity?

11

A Yes.

12

Q What, if anything, was done with

13

respect to the incentive that was fraudulently

14

generated; do you know?

15

A I believe they had to pay it back,

16

but I don't recall. It was a fairly small

17

sum.

18

Q Did you believe that the size of

19

the sum was important in determining the

20

appropriate response?

21

A Yes, I did.

22

Q Did you have any further incidents

23

with Paul Santamaria?

24

MS. CACACE: I'm sorry.

25

Do you mind taking a lunch break